

ARGUMENTS/REMARKS

Applicants would like to thank the examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and favorable reconsideration of the subject application is requested in view of the comments and/or amendments made herein.

Claims 1-34 remain in this application. The examiner has acknowledged that claims 17-21 and 24-25 are directed to allowable subject matter. New claims 35-48 are added without adding any new matter.

Claim 17 has been amended to add the limitations of the parent claim, and thus is allowable as indicated by the Examiner, as are claims 18-21, which depend on claim 17.

Note that claim 24 has been amended for editorial reasons only.

Claims 1-16, 22-23, and 26-34 were rejected under 35 U.S.C. §102(b) as being anticipated by Tanaka (U.S. 5,712,695). For the following reasons, the rejection is respectfully traversed.

Claim 1, as amended, recites a liquid crystal display having a plurality of stacked layers including a

plurality of electrically conductive layers disposed so as to be located near both of said opposing surfaces of said liquid crystal layers, wherein each pair of adjacent liquid crystal layers has exactly one of said electrically conductive layers is disposed between said pair of adjacent said liquid crystal layers

and also including drive electronics adapted to apply voltage pulses to

each of said pair of adjacent liquid crystal layers along the electrically conductive layer provided between said pair of adjacent liquid crystal layers for driving both of said pair of adjacent liquid crystal layers.

Such a feature is not found in the cited Tanaka reference.

Tanaka shows two different arrangements of LC layers and electrodes, as represented by Figure 1 (along with Figs. 9 and 17) and Figure 18. Figure 1 (along with Figs. 9 and 17) clearly shows that a pair of electrode layers, 20 & 19 and 18 & 17, are

provided between LC pairs 3/2 and 2/1, respectively, where each pair of electrode layers are dedicated to driving a single LC layer. Accordingly, the claim cannot read on these embodiments. Furthermore, although Figure 18 shows electrode layer 107 between LC layers 113/112, and electrode layer 106 between LC layers 112/111, the reference makes clear that the electrode layer 107 is not used to drive both of layers 113/112, and electrode layers 106 is not used to drive both of layers 112/111, but that each are paired up with the same counter electrode 104 to drive a single layer each (see col. 2, lines 48-64, where it is stated that each LC layer has its own dedicated driving electrode—see lines 54-56). Thus, Tanaka teaches that any given electrode driving layer drives only *one* LC layer, not more than one, as required by claim 1. Thus, claim 1 is patentable over all embodiments referred to in the reference, as are the claims that depend on claim 1.

Claim 9 recites a stacked liquid crystal display comprising first, second, and third liquid crystal layers, an upper middle layer of electrodes, and a lower middle layer of electrodes having a

a shared electrode addressing construction in which said *upper middle electrode layer* is adapted to enable driving of said first liquid crystal layer *and* said second liquid crystal layer and said *lower middle electrode layer* is adapted to enable driving of said second liquid crystal layer *and* said third liquid crystal layer

(emphasis added). Thus, the upper middle electrode layer drives a pair LC layers, and the lower middle electrode layer drives a different pair of LC layers. In contrast, as discussed above, Tanaka shows that each layer has its own dedicated layers of electrodes. Accordingly, claim 9 is patentable over the reference, as are the claims dependent thereon.

Claim 22 recites a stacked liquid crystal display comprising first, second, and third liquid crystal layers along with an upper middle electrode layer of electrodes and a lower middle electrode layer of electrodes, where

a pixel of said display includes a portion of said first liquid crystal layer adapted to be addressed by the combination of an electrode of said top electrode layer and an electrode of said upper middle electrode layer, and wherein

said pixel of said display further includes a portion of said second liquid crystal layer adapted to be addressed by the combination of an electrode of said upper middle electrode layer and an electrode of said lower middle electrode layer, and further wherein

said pixel of said display further includes a portion of said third liquid crystal layer adapted to be addressed by the combination of an electrode of said lower middle electrode layer and an electrode of said bottom electrode layer.

Accordingly, yet again, each of said upper middle electrode layer and said lower middle electrode layer are used to drive each of a different pair of layers of liquid crystal material. As discussed above, Tanaka fails to teach such a feature, and thus claim 22, along with the claims dependent thereon, are patentable over the reference.

Claim 26 recites a multi-layer stacked liquid crystal display film comprising a plurality of liquid crystal film layers and a plurality of electrode film layers for driving said plurality of liquid crystal film layers where "at least one of said plurality of electrode layers is adapted to enable driving of *two* adjacent said liquid crystal layers." As discussed above, Tanaka only teaches that any given driving electrode layer drives only one corresponding LC layer, in contrast to Tanaka where each electrode layer is dedicated to drive a corresponding LC layer, and thus claim 26 is patentable over the reference, as are the claims dependent thereon.

Claim 28 recites that "at least one of said plurality of conducting layers is adapted to enable driving of two adjacent said liquid crystal dispersion layers". The prior art does not disclose this feature, and thus the claim is patentable over the reference, as are the claims dependent thereon.

Claim 32 recites "drive electronics electrically connected to said electrical interconnects adapted to address both of said first liquid crystal layer and said second liquid crystal layer with the same voltage pulses". The cited reference fails to teach "addressing" the layer in this manner, and thus the claim is patentable over the reference, as are the claims dependent thereon.

Claim 34 recites "drive electronics electrically connected to said single electrode layer adapted to address both said first liquid crystal layer and said second liquid crystal layer with the same voltage pulses". Might have the same problem as claim 32, but should still be patentable for the same reasons.

The new claims also recite features directed at electrode layers driving more than one LC layer, which not found in the prior art as discussed above, and thus those claims are also patentable over the reference, as are the claims dependent thereon.

In consideration of the foregoing analysis, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. KENT-36398US1.

Respectfully submitted,
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